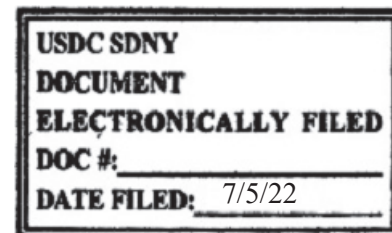


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July 1, 2022

Via ECF Only

Honorable Barbara Moses  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Garcia, et al. v. W Services Group LLC, et al.*  
*Docket No. 22-cv-01959 (JGK) (BCM)*

Your Honor:

We represent Defendants Cleaning Path Corp., and Cinia Ortega, individually (“Cleaning Path Defendants”). We write jointly, with counsel for plaintiffs, and counsel for Defendant W Services Group.

Since our last request, the parties have engaged in informal discovery demands, a significant document production, and settlement discussions in the hope of resolving this case without the need for further court intervention. To that end, the parties request that the Court grant a brief stay of **all case deadlines** so that we can proceed with mediation. We have a few potential mediators, and we are working together to find a mediator and date that works for all parties.

This Court previously granted 30 days of the 60 day stay we requested. We ask for 60 days in the interest of judicial economy, to avoid the need for further requests from this Court. This is the parties’ second request for a stay and to toll the FLSA statute of limitations for putative collective members for the 60 days that the stay would be in place. We have had brief further adjournments due to a scheduling conflict and a COVID-19 exposure.

Currently, the deadline for Cleaning Path Defendants to answer or otherwise respond to the Complaint is July 5, 2022. Defendant W Services Group has already issued its pre-motion letter seeking to dismiss, although that date/motion currently is stayed. The pre-trial conference is set for July 11, 2022 at 11:00am. Further, this court ordered a status update letter regarding the dispute outlined at Dkt. No. 15.

